

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MUNUSAMY KANDASAMY,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 1:18-cv-00029 (AJT-TCB)
ADVANCED SOFTWARE)	
SYSTEMS, INC.,)	
)	
Defendant.)	
)	

PLAINTIFF’S MOTION FOR SANCTIONS AGAINST RAJENDER SALGAM

Under this Court’s inherent power, Plaintiff Munusamy Kandasamy moves for sanctions against his former co-plaintiff in this case, Rajender Salgam. There is clear and convincing evidence that Mr. Salgam fabricated an email and doctored several others and caused these fraudulent emails to be introduced into this case, committing fraud on the court. Mr. Salgam did this, in part, by providing some of these documents to Mr. Kandasamy and instructing him to pass them along to his attorney. Mr. Salgam knew that Mr. Kandasamy was recovering from surgery and a major stroke at the time, and in this way, Mr. Salgam took advantage of Mr. Kandasamy’s limited capacity. As a result of Mr. Salgam’s actions, the case was stayed to permit discovery into the fraud allegations and Mr. Kandasamy has had to incur substantial attorney’s fees and costs during this fraud-related discovery period. Indeed, his resources have been exhausted to the point that he could not continue with the case and has had to dismiss his claim. *See* Dkt. No. 88.

Accordingly, Mr. Kandasamy requests, that the Court, under its inherent power and Federal Rules of Civil Procedure 54(b), 59(e), and 60(b), should modify its order dismissing Mr.

Salgam from this case, Dkt. No. 26, and sanction Mr. Salgam by ordering him to pay all fees and costs Mr. Kandasamy has incurred in this case, and should award all other appropriate relief. To that end, Mr. Kandasamy requests the Court allow him to file a detailed petition for attorney's fees and costs.

A proposed order and memorandum in support are attached to this Motion.

Respectfully submitted,

/s/ Robert Porter

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CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2019, the foregoing Plaintiff's Motion for Sanctions was served by electronic mail and via Federal Express to:

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And via the Court's e-file system to:

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